

BROCHURE
* * *

18-11986
CONTAINING STATEMENT
OF FACTS
AND SUPPORTING DATA

IN RE

BRIAN BROCHU

PLAINTIFF

VS

GENESEE COUNTY, et al

Defendants

IN UNITED STATES DISTRICT COURT EASTERN
DISTRICT OF MICHIGAN
SOUTHERN DIVISION

CASE NO* 5:18-CV-11986-JEL-EAS

Filed: JUNE 25, 2018

INCIDENT: ON OR ABOUT, APRIL 2014

SUBMITTED TO

MARC J. BERN + PARTNERS, LLP/s Stephen F. MONROE

225 WEST WASHINGTON, SUITE 2200, CHICAGO, ILL 60606

FROM: BRIAN BROCHU, CHIPPENAW CORP. FAC. 49734, 4269 KICHWA, MI.

TABLE OF CONTENTS

* VOLUME 1 *

"TRAUMA"
PAGES

STATEMENT OF FACTS:

BACKGROUND OF BRIAN BROCHU -	I-II
BACKGROUND INFORMATION CONCERNING DEFENDANT	II-III
DESCRIPTION OF INJURY BASED ON STATEMENT BY PLAINTIFF -	III-VI

DISCUSSION:

LIABILITY -	VI-VII
SPECIAL DAMAGES	VI-VII
PAIN AND SUFFERING	VI-VII

BRIAN BROCHU #945717

PLAINTIFF

CHIPPEWA CORRECTIONAL FACILITY

4269 W. M-80

KINCHELOE, MICHIGAN 49784

MARC J. BERN

& PARTNERS LLP

ATTORNEYS AT LAW

RE: RESPONSE TO TELEPHONE CONVERSATION

7-20-2020. REGARDING CASE NO "5:18-CV-
11986-JEL-EAS"

SOLOMON RADNOR, OF EXCOLO LAW, PLLC;
CONARD BENEDETTO, OF LAW OFFICES OF
CONRAD BENEDETTO; AND STEPHEN F.
MONROE, OF MARC J. BERN & PARTNERS,
LLP, COUNSEL FOR PLAINTIFF, BRIAN
BROCHU a part of IMANI HATCHER Et. AL.,

GENTLEMEN:

My NAME IS BRIAN BROCHU #945717. I AM ONE OF THE
PLAINTIFF'S IN THE ABOVE CAUSE OF ACTION. THIS ACTION WAS
FILED ON JUNE 25, 2018. THIS ACTION CONCERN CONTAMINATION
OF WATER AT THE GENESSEE COUNTY JAIL... STEPHEN MONROE
FILED HIS APPEARANCE ON MAY 23, 2019, AND REFILED IT
AGAIN BECAUSE OF TECHNOLOGICAL DIFFICULTIES ON 9-6-19.

this technological difficulties According to Attorney Stephen Monroe is Related to the Representation. Obviously its Not the lack of 'Stating a claim' or Whether a genuine issue of fact does Not exist. --- and obviously Plaintiff has Made Pass a Summary Judgment. Counsel may have made it impossible to overcome Representation for all defendants, who are Now Plaintiff's that was at the Genesee County Jail. Such plaintiffs as a whole may Not have damage, Problem, loss, Statute. However, there is no doubt that there was, and still perhaps a preponderance of evidence. . . . that the water is and were contaminated. . . . Even tortious. . . where there is not only wrong, by way of how the jail Personnel handled inmates concerning the water. . . What was done. . . . but also the damages resulted therefrom, Place, time, or thing arising out of the contaminated water.

I am pleased to submit herewith a comprehensive brochure in two volumes containing a Statement of facts with corroborating exhibits in support of the this Plaintiff claim for damages.

It should be understood that this brochure is my property and is to be Returned to me after settlement of this claim. It is hoped that we shall be successful in our efforts to settle the pending law suit. However, if this cannot be accomplished by the time court pretrial proceedings begin, it is understood that at this time, you will Return the complete brochure to me. All exhibits and Reports we agree that you would send

That are legally entitle to have for my records, updating me as to what your office have accomplished thus far. BEING that your office have NOT SENT any information to me CONCERNING this matter.

SINCE this brochure is submitted for settlement purposes only, it is explicitly understood that NONE of its contents may be used by defendant(s) for evidence in the pending court proceedings without the express permission of you, your office OR I, the Plaintiff.

YOU ARE REQUESTED to Acknowledge the Receipt of this brochure at once consenting to the term of a reasonable or more terms under which it has been voluntarily submitted to you. Additional copy of this letter and of the Statement of facts contained herein are furnished to you and the court for its records and that they may be forwarded to personal counsel for the defendants in connection with the excess sued for above insurance coverage.

IN this connection, I wish to inform you and your office of my willingness to discuss the possibility of setting this claim with the defendant within the policy limits.

I AM, Thanking you for your COOPERATION
IN this matter.

Dated: 7-24-20

Very Truly
B. J. Lee

STATEMENT OF FACTS

IN RE:

BRIAN BRDCHU

VS

GENESEE COUNTY, et al.,

BACKGROUND OF BRIAN BRDCHU

BRIAN BRDCHU, is a plaintiff of the case along with other plaintiff against GENESEE COUNTY Jail, GENESEE COUNTY. Plaintiff was incarcerated at GENESEE COUNTY Jail, for Armed Robbery charge from July 29, 2013 till October of 2014. DURING Plaintiff INCARCERATION IN the COUNTY Jail, Plaintiff attracted a TOXIC agent; ENLARGEMENT, and abdominal pain. Upon transferred from GENESEE COUNTY Jail.. to Michigan Department of CORRECTIONS it was acknowledge that Plaintiff was living with hepatitis INFECTION facing a substantial Risk of developing SERIOUS complications; CAUSING treatment TWICE, and ended September 2019 through a combination of medical treatments. PRIOR to this condition Plaintiff had been in PERFECT health. Plaintiff had NEVER evidenced any physical or mental disorder... Plaintiff is 48 YEARS of Age, and has now experience great deals of EMOTIONS UNWELCOME, ... DEPRESSED at times, SINCE knowing that Hepatitis C... CAN RETURN and the fact that it was CONCEALED from ME while I WAS at the GENESEE COUNTY Jail. At the TIME I WAS SWAB, giving blood ETC. UPON ENTERING... Admitted to Jail. NO-ONE SAID ANYTHING... OBVIOUSLY THERE WAS NOTHING

Maybe upon arrival but inmate was checked out and at some giving point Hepatitis should had be found... and for M.D.O.C to find Hepatitis upon arrival during a few days after admitted... than Genesee County Jail had to know and intentionally concealed this medical information.

Dated

Back Ground Information concerning Defendant

* * * * *

Defendant is County of Genesee et al (County Jail) which is a municipal corporation, authorized under and created by the laws of the State of Michigan. Through its agents, supervisors, operating officers, Boards and Committees and and final Policymakers, Defendant County Establishes, promulgates and implements the policies regarding the assignment and compensation of defense counsel to prisoners who are confined in its County Jail on criminal charges and it was the custom and policy of the defendants County of Genesee failure to Adequately Allow contamination of the water to reach the level of tortious nature to supply Genesee County Jail during the switch of "Flint, Michigan's water source" to the "Flint River" in April 2014. Disregarding level of contamination in the River... allowing inmates to shower, wash face, and body... cook their food... an all further in humane treatment using the tortious contamination and toxic water causing plain-

■ tiff to Attrack hepatitis C. INTER ALA. AND further obviously CONCEAL the INFORMATION CONCERNING the CONDIT-
ION OF THE WATER. DEFENDANT COUNTY by and through
its final POLICYMAKERS, obviously, the COUNTY Board of
COMMISSIONERS, did NOT provide the Safty of PLAINTIFF
Health.

LIABILITY

* * *

FROM all the facts in this CASE, IT WOULD
APPEAR that the Liability of GENESEE COUNTY
JAIL, GENESEE COUNTY... IS ASSURED. although Jail is
an INSTITUTION in which an accused PERSON is held to await
TRIAL OR after CONVICTION for an offense, BE IT CRIMINAL OR
CRIMINAL, legislation has NOT INFREQUENTLY singled out SPECIAL
groups OR special types of subject matter for SPECIAL
treatment. Such acts and condition in the GENESEE COUNTY
Jail VIOLATED the equal protection clauses in the UNITED STATES
CONSTITUTION and OR a comparable provision in Michigan State
CONSTITUTION. There has BEEN by defendant(s) "showing of bad
faith, and OR any other UNUSUAL CIRCUMSTANCE that fit
Equitable Relief." The fact that Plaintiff was admitted
into GENESEE COUNTY Jail... THERE WAS SWAP TEST TEST INTER ALIA....
Nothing in the Results showed hepatitis... at some point
at stay... hepatitis showed... But Nothing was said UNTIL
Plaintiff was PROCESSED INTO M.D.D.C. IN 2014, and all LAWYERS
has had this CASE OR INFORMATION about tortious contamination
of WATER and I as their client... SINCE 2016.

BECAUSE OF THE REASON YOU SEEK TO WITHDRAW AS COUNSEL FOR PLAINTIFFS BECAUSE OF INSURMOUNTABLE DIFFICULTIES RELATING TO PLAINTIFFS REPRESENTATION. WHICH IS 78 PLAINTIFFS TOTAL TWO COUNSEL... I HAVE NO IDEA HOW MANY PLAINTIFFS YOU ACTUALLY WHAT DAMAGE AND INJURY WAS DONE DUE TO WATER CONTAMINATION, TORTIOUS CONTAMINATION... HOWEVER, THERE IS AN PREPONDERANCE OF EVIDENCE... DAMAGE TO PERSON, WHERE DAMAGE, INJURY, AND LOSS, EXIST. SURELY YOUR OFFICE HAVE GOTTEN MY MEDICAL RECORDS FROM THE TREATING HEALTH CARE DEPARTMENT FROM THIS FACILITY.

DEFENDANT(S) DID ACT IN A MANNER THAT WAS GROSSLY NEGLIGENT IN THE FOLLOWING WAYS:

A. DEFENDANTS KNEW THEIR ACTIONS, INCLUDING FAILURE, FAILURE TO DISCLOSE, AND INDEED AFFIRMATIVELY CONCEAL INFORMATION THAT CLEARLY CONSTITUTED EVIDENCE THAT PLAINTIFF BEING IN THE GENESEE COUNTY... CONSUMING TORTIOUS AND TOXIC CONTAMINATION WATER, WASHING HIS BODY (SHOWERING) DRINKING INTER ALIA. CLEARLY CONSTITUTE GROSS NEGLIGENCE, AMONG OTHER THINGS AS WELL.

B. DESPITE THIS KNOWLEDGE, DEFENDANTS DELIBERATELY PERSISTED IN THEIR FAILURE TO DISCLOSE AND IN CONCEALING THE INFORMATION OF TORTIOUS, TOXIC, CONTAMINATION WATER TO INMATES IN THE GENESEE COUNTY JAIL... DEFENDANTS CONTINUED WITH THEIR PATTERN OF DECEPTION.

c. DEFENDANTS WELL KNEW OR SHOULD HAVE KNOWN their failure to disclose adequate information, and IN fact CONCEAL FRAUDULENT this information would and did harm Plaintiff BRIAN BROCHU, in the way set forth above;

d. Notwithstanding the knowledge that defendant actions, as set forth above, would seriously harm this Plaintiff, defendants failed to take any action to prevent that harm;

e. THERE WAS NO REASONABLE law ENFORCEMENT purpose served by the actions of the defendants in failing to disclose the information about the WATER (RIVER) and IN fact CONCEALING (FRAUDULENT CONCEALING) the aforementioned information (finding) (as to TOXIC, TOTOUS CONTAMINATION OF RIVER WATER)

f. As a direct and proximate result of defendants grossly negligent acts and conduct, Plaintiff BRIAN BROCHU, had suffered SEVERE damages, many of which effects continue to plague Plaintiff BRIAN BROCHU to this day and continue including but not limited to:

- a. PERSONAL AND PHYSICAL INJURY;
- b. PAIN AND SUFFERING;
- c. SEVERE MENTAL ANGUISH;
- d. EXTREME FEAR.
- e. INTENTIONAL INFLECTION OF EMOTIONAL DISTRESS.
- f. INADEQUATE TO NONE MEDICAL CARE; HUMILIATION, INDIGNITIES, AND EMBARRASSMENT;
- g. DEGRADATION;
- h. LOSS OF NATURAL PSYCHOLOGICAL DEVELOPMENT, INCLUDING THE ONSET OF TRAUMATIC MENTAL ILLNESS; AND
- i. DIETS, LOSS OF SLEEP, ONLY ALLOWED CERTAIN JOB'S.

WHEREFORE, ^V PLAINTIFF DEMANDS JURY TRIAL... OR AND HAVE THIS BROCHURE SUPPLEMENTED WITH HIS COUNSEL ARGUMENT FOR PLAINTIFF. ³ JOINTLY AND SEVERALLY AGAINST ALL MUNICIPAL CORPORATIONS:

(a) A declaration that defendants violated the Federal Rights and state Rights pursuant to 28 U.S.C. §§ 2201

(b) COMPENSATORY DAMAGES WAS INTENDED FOR CONDUCT IN THE MANNER INJURY WAS INTENTIONAL... CONSTITUTING INTENTIONAL INFLECTION OF EMOTIONAL DISTRESS, CONSTITUTIONAL, OUTRAGEOUS INFLECTION OF EMOTIONAL DISTRESS.

(c) PUNITIVE AND EXEMPLARY DAMAGES AGAINST MUNICIPAL CORPORATIONS, TO THE EXTENT ALLOWABLE BY LAW.

PLAINTIFF ALSO ASKS THAT THIS COURT TAKE JUDICIAL NOTICE THAT:

THE COUNSELS HAD PLAINTIFF CASE SINCE 2016. PLAINTIFF KNOWS NOTHING AS TO WHAT STAGE, WE ARE AT, WHAT HEARINGS HAS BEEN HELD, WHAT SETTLEMENT OFFERED IF SO. SO UNDER THE SURROUNDING CIRCUMSTANCES THIS BROCHURE SHOULD BE SUPPLEMENTAL ADDED TO AND OR WITH AND PROCEEDING BY COUNSEL BEING INITIATED.

FOR THE HARM THAT RESULTED FROM DEFENDANTS INTENTIONAL WRONG INFLICTED UPON PLAINTIFF BRIAN BROCHU, IT WAS NOT ONLY INTENTIONAL, BUT OUTRAGEOUS AND DAMAGE AWARD SHOULD BE A LARGE DAMAGE AWARD \$45,000.00, AND COUNSEL SHOULD ASK FOR THEIR REASONABLE ATTORNEY'S FEES AND COSTS PURSUANT TO 42 U.S.C. §§ 1988; 42 U.S.C. §§ 1920; AND SUCH OTHER AND FURTHER RELIEF AS APPEARS JUST AND PROPER.

EXECUTED ON: 7/24/2020

VERY TRULY SUBMITTED.



AUTOGRAPH:

CHIPPEWA CORRECTIONAL FACILITY
4262 W. M-80
KINCHELOE, MICHIGAN 49784

I BRIAN BROCHU, BEING A PLAINTIFF IN THE ABOVE CAUSE OF ACTION DECLARE UNDER THE PENALTY OF PERJURY THAT THE MENTION ABOVE IS TRUE TO THE BEST OF MY INFORMATION, KNOWLEDGE AND BELIEF.

DATE: 7/24/2020

AUTOGRAPH

SIGNATURE



BRIAN BROCHU 945717
Plaintiff

STEPHEN F. MONROE, Esq

CASE NO. 5:18-CV-11986
Hon. Judith E. LEVY

PROOF OF SERVICE

I BRIAN BROCHU declare under the penalty of perjury
I SENT a 'CIVIL BROCHURE' to COUNSEL STEPHEN F. MONROE
IN THE ABOVE MATTER... to his RESPECTIVE address:

MARC J. BERN & PARTNERS LLP

ATTORNEY at LAW.


225 WEST Washington,

SUITE 2200

CHICAGO, ILLINOIS 60606

With Postage Pre-Paid... and Placing the SAME IN
THE UNITED STATES POSTAL 7-27-2020. FURTHER I
Sayth Not.

DATED: 7/28/2020


BRIAN BROCHU 945717
CHIPPEWA CORRECTIONAL FACILITY
4269 W. M-80
KINCHELOE, Michigan
49734

BRIAN BROCHU 945717
CHIPPEWA CORRECTIONAL FACILITY
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KINCHELOE, MICHIGAN 49784



7/29/20

CLERK OF THE COURT
U.S. DIST. COURT
EASTERN DISTRICT OF MICHIGAN
THEODORE LEVIN UNITED STATES
COURTHOUSE, 231 W. LAFAYETTE
BLVD.
DETROIT, MICHIGAN 48226